

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

In the Matter of:)
)
MCI COMMUNICATIONS SERVICES, INC.;)
BELLATLANTIC COMMUNICATIONS, INC.;)
NYNEX LONG DISTANCE COMPANY; TTI)
NATIONAL, INC.; TELECONNECT LONG)
DISTANCE SERVICES AND & SYSTEMS)
COMPANY; AND VERIZON SELECT)
SERVICES, INC.)

COMPLAINANTS)

v.)

WINDSTREAM KENTUCKY WEST, INC.;)
WINDSTREAM KENTUCKY EAST, INC. –)
LEXINGTON; AND WINDSTREAM)
KENTUCKY EAST, INC. – LONDON)

DEFENDANTS)

RECEIVED

MAR 30 2009

PUBLIC SERVICE
COMMISSION

Case No. 2007-00503

**SPRINT NEXTEL’S INITIAL REQUESTS FOR INFORMATION TO
WINDSTREAM**

Sprint Communications Company L.P., Sprint Spectrum L.P., Nextel West Corp., and NPCR, Inc. d/b/a Nextel Partners (collectively, “Sprint Nextel”), by counsel, file this Initial Request for Information to Windstream Kentucky West, Inc., Windstream Kentucky East, Inc. – Lexington, and Windstream Kentucky East, Inc. – London (collectively, “Windstream”). Pursuant to the Kentucky Public Service Commission’s March 11, 2009 Order in this case, responses to these Initial Request for Information are due on April 24, 2009.

DEFINITIONS

"And" and "Or" shall mean "and/or."

"Affiliate" shall have the meaning as defined in 47 U.S.C. § 153(1). "Affiliated" shall be construed in a manner consistent with the meaning of "Affiliate" as defined in 47 U.S.C. § 153(1).

"Company" shall mean Windstream Kentucky West, Inc., Windstream Kentucky East, Inc. – Lexington, and Windstream Kentucky East, Inc. – London (collectively, "Windstream").

"Communication" or "communications" shall mean all meetings, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, mailgrams, and all oral and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more persons.

The term or terms "Windstream," "you," or "your" shall refer to the Company, its predecessor(s), if any, as well as its divisions, parent and subsidiary entities, all related companies for which the incumbent local exchange Carrier has partial or full ownership or control, all other companies sharing management with the Company, and the officers, directors, employees, agents, representatives, and other personnel thereof, any entity through which the Company provides telecommunications service, and all Affiliates.

"Concerning" and "concern" shall mean memorializing, mentioning, to be connected with, comprising, consisting, indicating, describing, referring, relating to, evidencing, showing, discussing, or involving in any way whatsoever the subject matter of the Request for Information.

"Describe" when used with respect to an occurrence, event, activity, or any transaction, means to provide a complete and detailed list of its nature, its time and place and to identify the persons present and involved. The term "describe" when used with respect to a document,

means to provide a complete and detailed description of its nature and content. The term "describe," when used with respect to a communication other than a document, means to provide a complete and detailed description of its nature and content.

The term or terms "document", "documentation", "data", "material" and "information" shall include, but are not limited to, the following-regardless of format (e.g., electronic, paper copy or other form of audio, electronic or visual recording items: correspondence, memoranda, financial data, reports, investigations, studies, analyses, calculations, plans, communications, notes, notebooks, marginalia, telephone logs, recordings, opinions, decisions, photographs, drawings, sketches, graphic renderings, bulletins, pamphlets, circulars, articles, press releases, video tapes, data compilations, drafts, brochures, and other documents or tangible things of whatever description that may constitute or contain information within the scope of the Request for Information, which are in the possession, custody and control of the Company - including without limitation, any officers, directors, employees, agents, attorneys or other representatives or Company's Affiliates.

"Identify" or "state the identity of" means:

- (a) In the case of a person, to state the name; last known residence; employer or business affiliation; and occupation and business position held.
- (b) In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.
- (c) In the case of a document, to state the identity of the person(s) who prepared it; the sender and recipient; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and publication; the location

of each copy and the identity of the present custodian; and the identity of the person(s) who can identify it.

- (d) In the case of a fact, an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or belief about the act; when the act, event, or omission first became known; the circumstances; the manner in which such knowledge was first obtained; and the documents or other writings which memorialize the instance.

“Including” means “including but not limited to.”

"Person" or "Persons" shall mean any individual, association, partnership, corporation, firm, organization, or entity.

"Refer," "referring to," "relate," “related” and "relating to" shall mean having a legal, factual or logical connection, relationship, correlation, or association with the subject matter of the request.

Representatives” means directors, officers, staff, employees, agents, members, consultants, witnesses or other persons acting on behalf of the party to which these requests for information are served.

“Telecommunications Carrier” shall have the meaning defined pursuant to 47 USC § 153(44).

Words of gender shall be construed as including all genders, without limitation.

Words in the singular shall be construed to mean the plural or vice versa as appropriate.

INSTRUCTIONS

1. These Requests for Information are continuing in nature, requiring you to change, supplement, and correct all responses to conform to available information, including such information as first becomes available to you after the responses hereto are filed and made, should additional information become known or should information supplied in the responses prove to be incorrect or incomplete.
2. Each Request for Information shall be answered separately. The Response to each Request for Information provided should first restate the Request for Information. In producing documents in response to these Requests for Information, you should number each document and indicate the specific Request for Information in response to which the document is being produced. To the extent that any document falls within the scope of multiple Requests for Information, multiple productions are not contemplated; one production with reference to each of the multiple Requests for Information is sufficient.
3. In answering these Requests for Information, furnish all information that is available to you or may be reasonably ascertained by you or otherwise subject to your Company's knowledge, possession, custody or control.
4. As part of each of response to a Request for Information, identify the person or persons most knowledgeable about such response, the person or persons responsible for the preparation of such response, and the name of the witness in this proceeding who will sponsor the answer and can vouch for its accuracy.
5. If any document inquired about has been lost or destroyed, identify the document by author, date, subject matter, place, manner, reason and the circumstances of the loss or destruction, the last known location of the document, and the person who has knowledge concerning the manner in which it was lost or destroyed.

6. If you object to any part of a Request for Information, answer all parts of such requests to which you do not object, and as to each part to which the Company does object, separately set forth the specific basis for the objection.
7. If form of privilege or other protection from disclosure is claimed as a ground for withholding information within a document that is responsive to a Request for Information, set forth with respect to such document:
 - (a) the date and number of pages of the document;
 - (b) the identity of the author(s) and or preparer(s);
 - (c) the identity of the addressee, if any;
 - (d) the title;
 - (e) the type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
 - (f) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
 - (g) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
 - (h) the identity of the present custodian(s);
 - (i) the nature of your claim of non-discoverability (e.g., attorney client privilege); and,
 - (j) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit Sprint to make a full determination as to whether the claim is valid.

INITIAL REQUESTS FOR INFORMATION

Request No. 1

Specify the amount of intrastate switched access revenue Windstream generated in Kentucky in 2008 from each rate element. Please provide this information separately for each of the three Windstream filing entities in Kentucky. Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing such revenue.

Request No. 2

Specify the billed access minutes associated with the local switching revenue amounts provided in Request No. 1. Please provide this information separately for each of the three Windstream filing entities in Kentucky. Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing such access minutes.

Request No. 3

Please provide the total switched access lines in service in Windstream's Kentucky service areas as of 12-31-07 and 12-31-08. Please provide a breakdown of those lines between residential and business lines. Please provide this information separately for each of the three Windstream filing entities in Kentucky. Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing such lines.

Request No. 4

Please provide the revenue collected from Windstream local service customers for the calendar years 2004 through 2008 for each of the following services from Windstream in Kentucky. Please split the revenues between residential and business customers. Please provide this information separately for each of the three Windstream filing entities in Kentucky. Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing such revenue.

- (a) basic local service including mandatory additive services such as extended area calling, dial tone, etc.
- (b) long distance toll service
- (c) DSL
- (d) all calling features
- (e) wireless services

Request No. 5

Please provide the count of Windstream local service customers that could have obtained each of the following services from Windstream at the end of each of the calendar years of 2004 through 2008. Please split the customer counts between residential and business customers. Please provide this information separately for each of the three Windstream filing entities in Kentucky. Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing such customer counts.

- (a) Basic local service
- (b) long distance toll service
- (c) DSL
- (d) wireless service

Request No. 6

Please provide the total universal service support payments Windstream received for its Kentucky operations from the various state and federal high cost service programs for each of the calendar years of 2004 through 2008. Please breakdown that universal service support between High Cost Model, High Cost Loop, Safety Net Additive, Safety Valve, Interstate Access, Local Switching and Interstate Common Line. Please provide this information separately for each of the three Windstream filing entities in Kentucky.

Request No. 7

Please provide the total revenue generated in the 2008 calendar year for basic residential local exchange service including mandatory additive services such as extended area calling, dial tone, etc. for each of the states in which Windstream operates a local telephone company.

Request No. 8

Please provide the number of residential switched access lines that were in service on 12-31-07 and 12-31-08 in the each of the states in which revenues were provided in response to Request No. 7.

Request No. 9

Please provide the current rate offerings of reciprocal compensation services in Kentucky including local switching, common transport and tandem switching. Please provide this information separately for each of the three Windstream filing entities in Kentucky if the rate is different.

Request No. 10

Please identify and provide any other documents not provided in Request No. 9 concerning, constituting, discussing, referencing, addressing, or describing the costs associated with performing end office switching, tandem switching, and transport functions by Windstream incumbent local exchange carriers in Kentucky. This request includes but is not limited to Windstream's most recent studies for Kentucky of the costs of intrastate access, unbundled end office switching, unbundled tandem switching and unbundled transport and reciprocal compensation services.

Request No. 11

Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing any competitive or pricing advantage the Windstream wireline long distance entities enjoy relative to wireline long distance entities not affiliated with Windstream due to the fact that intrastate switched access fees are paid to the Windstream incumbent local exchange carriers by long distance providers for long distance calls originating or terminating within Windstream's incumbent local exchange service areas.

Request No. 12

Identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing the effect of high intrastate switched access rates on competition in any market segments, including but not limited to the wireless market and the wireline long distance market. Please include all documents Windstream has submitted in other state and federal jurisdictions addressing the impact of intrastate switched access rates on competition, including but not limited to complaints, testimony and supporting data.

Request No. 13

(a) Identify Windstream's initial switched access rates in Kentucky along with the date such rates were established;

(b) Identify any subsequent adjustments to your initial switched access rates identified in (a) along with the date(s) that the adjusted rates were established;

Request No. 14

Please identify each situation within the last five years where a Windstream local telephone company was required to reduce the level of its intrastate switched access rates as the result of state regulatory or legislative mandate. Please include a description of the access change rates, the amount of annual access revenue reduction and other rate changes permitted by the mandate.

Request No. 15

Please identify and provide all documents concerning, constituting, discussing, referencing, addressing, or describing an affordable rate level for residential basic local service.

Request No. 16

Please provide the percentage of Windstream switched access lines in Kentucky that are presubscribed to Windstream long distance service offered by Windstream Communications, Inc. or any other Windstream entity or affiliate, whether facilities-based or through a third party IXC wholesale long distance arrangement.

Request No. 17

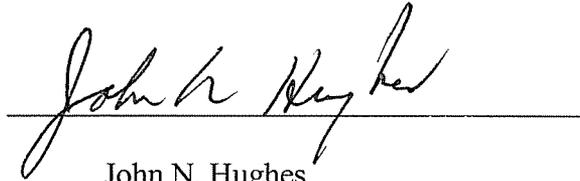
Please provide the percentage of Windstream's Kentucky residential customers:

- a) that purchase a service bundle
- b) that purchase basic local service only
- c) that purchase basic local and at least one additional local service

Request No. 18

Please provide the amount of intrastate switched access cost Windstream's long distance operations in Kentucky, including Windstream Communications, Inc. or any other Windstream entity, were billed by the three Windstream local companies in Kentucky in 2006, 2007 and 2008. If the access bills were rendered to a third party IXC providing wholesale long distance service to Windstream's long distance operations, please provide the amount of access revenue billed to that interexchange carrier in 2006, 2007 and 2008.

This 30th day of March, 2009.



John N. Hughes
Attorney at Law
124 West Todd Street
Frankfort, Kentucky 40601
(502) 227-7270 (o)
(502) 875-7059 (fax)

Attorney for Sprint

CERTIFICATE OF SERVICE

I certify that the First Request for Information of Sprint Communications Company L.P. has been served by mailing to the following parties:

Daniel Logsdon
Vice President, State Government Affairs
Windstream Kentucky West
130 West New Circle Road
Suite 170
Lexington, KY 40505

Dulaney L. O'Roark III
VP & General Counsel - SE Region
Verizon
5055 North Point Parkway
Alpharetta, GA 30022

Douglas F. Brent
Attorney at Law
Stoll Keenon Ogden, PLLC

2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

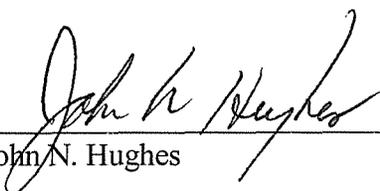
Robert C. Moore
Attorney At Law
Hazelrigg & Cox, LL.P
41 5 West Main Street
P.O. Box 676
Frankfort, KY 40602

Mary K Keyer
General Counsel/Kentucky
BellSouth Telecommunications, Inc. dba AT&T
601 West Chestnut Street, Room 408
Louisville, KY 40203

Kimberly Caswell
Associate General Counsel
Verizon
PO Box 110, MC FLTC0007
Tampa, FL 33601-0110

Mark Overstreet
Stites & Harbison
421 West Main St
Frankfort, KY 40601

This 30th day of March, 2009



John N. Hughes